

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***COMMENTS AND RESPONSE***  
**ON THE DRAFT/PROPOSED PERMIT**

Comments on Southwire Draft Title V Air Quality Permit submitted by Paul N. Sims, Corporate Environmental Manager.

**Permit Statement of Basis**

- Source Description The Source Description should be revised to reflect molten aluminum as a raw material and to correct number of production units. The Source Description should also be modified to clearly indicate which furnaces at the facility are currently considered group 1 or group 2 under the Secondary Aluminum NESHAP (40 CFR Part 63, Subpart RRR)

*Division's response: Comment acknowledged, change made.*

- Comments, Section 1), 2), 3) & 4) Listing capacity in terms of “pounds per hour” is not appropriate for the furnaces; instead, furnace volume is a more appropriate measure of capacity. “The furnaces.....”

*Division's response: Comment acknowledged, change made to annual average process rates instead of maximum processing rate under the description section.*

- Comments, Section 1)a)ii. Melt furnaces S1 and S2 are not “group 1 melting/holding furnaces” as defined by 63.1505(i)(2). They are “group 1 furnaces that can process other than clean charge” and are subject to 63.1505(i)(1). Therefore, the PM emission limit should be revised accordingly. Also, S3 & S4 are currently group 2 furnaces, and they do not have a PM limit under the NESHAP. SCKP requests that the permit contain provisions (alternative operating scenarios) to allow us the option of converting S3 and S4 to group 1 furnaces in the future.

*Division's response on melt furnaces S1 and S2: Comment acknowledged, change made.*

*Division's response on melt furnaces S3 and S4: The Division partly agrees with the comment but the suggested alternative operating scenarios will not be approved. The permittee may submit a permit revision to convert the existing group 2 furnaces to group 1 furnaces at a later date.*

- Comments, Sections 1)b)ii.D), 2)b)iv.C), 3)b)iv.C), & 4)b)v.D) These conditions should reference the most recent division-reviewed OM&M Plan.

*Division's response: The Division considered the request and responded by revising the requirements to read as follows;*

*The permittee shall be in compliance with the most recently revised and KDAQ approved OM & M plan.*

- Comments, Section 1)b)ii.E) & F). Melt furnaces S1 and S2 are not “group 1 melting/holding furnaces” as defined by 63.1505(i)(2). They are “group 1 furnaces that can process other than clean charge” and are subject to 63.1505(i)(1). Therefore, the PM emission limit should be

revised accordingly.

*Division's response: Comment acknowledged, change made.*

- Comments, Section 1)b)ii.H & I) Melt furnaces S1 and S2 are “group 1 furnaces that can process other than clean charge”. As such, they are subject to D/F emission limits.

*Division's response: The Division agrees with the comment. Language has been added to reflect the recommendation.*

- Comments, Section 2)a)ii. Melt furnace S3 is currently a group 2 furnace, and not a “group 1 melting/holding furnace” as defined by 63.1505(i)(2). Therefore, it does not have a PM limit under the NESHAP. SCKP requests that the permit contain provisions (alternative operating scenarios) to allow us the option of converting this furnace to a group 1 furnace in the future.

*Division's response on melt furnace S3 PM limit: Comment acknowledged, change made.*

*Division's response on melt furnace S3 alternative operating scenarios: The Division does not agree with the comment. The permittee may submit a permit revision to convert the existing group 2 furnaces to group 1 furnaces at a later date.*

- Comments, Section 3)a)ii. Holding furnaces S6 & S7 are currently a group 2 furnaces, and not a “group 1 melting/holding furnaces” as defined by 63.1505(i)(2). Therefore, they do not have a PM limit under the NESHAP. SCKP requests that the permit contain provisions (alternative operating scenarios) to allow us the option of converting this furnace to a group 1 furnace in the future

*Division's response on Holding furnaces S6 & S7 PM limit: Comment acknowledged, change made.*

*Division's response on Holding furnaces S6 & S7 alternative operating scenarios: The Division does not agree with the comment. The permittee may submit a permit revision to convert the existing group 2 furnaces to group 1 furnaces at a later date.*

- Comments, Section 4)a)ii. Furnaces S8 and S9 are not “group 1 melting/holding furnaces” as defined by 63.1505(i)(2). They are “group 1 furnaces that can process other than clean charge” and are subject to 63.1505(i)(1). Therefore, the PM emission limit should be revised accordingly.

*Division's response: Comment acknowledged, change made.*

- Comments, Section 4)b)v.E) & F). Furnaces S8 and S9 are not “group 1 melting/holding furnaces” as defined by 63.1505(i)(2). They are “group 1 furnaces that can process other than clean charge” and are subject to 63.1505(i)(1). Therefore, the PM emission limit should be revised accordingly.

*Division's response: Comment acknowledged, change made.*

- Comments, Section 4)b)v.H) & I). Melt furnaces S8 and S9 are “group 1 furnaces that can process other than clean charge”. As such, they are subject to D/F emission limits.

*Division's response: The Division agrees with the comment. Language has been added to reflect the recommendation.*

- Comments, Section 6)a) & Section 8) These sections should be updated to reflect the correct number and designation for each insignificant activity.

*Division's response: Comment acknowledged, change made.*

- Comments, Section 7) SCKP proposes that this section be revised as noted. More detail is provided in the discussion for Section D, 3., Page 55” of the Draft permit below.

*Division's response: Comment acknowledged, change made.*

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- Section B, Group Requirements, Page 2, 14, 19, 24, & 30 Listing capacity in terms of “pounds per hour” is not appropriate for the furnaces; instead, furnace volume is a more appropriate measure of capacity. “The furnaces.....”

*Division's response: Comment acknowledged, change made to annual average process rates instead of maximum processing rate under the description section.*

- Section B, 2.b)ii, Pages 4, 33, & 45. SCKP requests that the SAPU emission limits and associated note be removed from the permit. Instead....”

*Division's response: The SAPU emission limits will remain in the permit. The SAPU emission limits are to aid the permit reader how compliance will be obtained for the specific emission limitation.*

- Section B, Compliance Demonstration Method, Pages 6, 15, 26, 34, & 46 By referring the Statement of Basis in the permit implies that it is an enforceable document (in addition to the permit). Therefore, we request that the references to the Statement of Basis be removed from the Permit.

*Division's response: Comment acknowledged, change made.*

- Section B, 4.g), Page 49 This condition should be revised to indicate that SCKP has the option to monitor bar casting rate as an alternative parameter (instead of amount of feed charge). As written, the condition appears to imply that monitoring the bar casting rate is required.

*Division's response: Comment acknowledged, change made.*

- Section C, Pages 52-54 These pages should be updated to reflect the correct number and designation for each insignificant activity.

*Division's response: Comment acknowledged, change made.*

- Section D, 3., Page 55 The State Origin Requirements for aluminum oxide and chlorine should be removed, and the requirements for hydrogen fluoride should be revised.

“Aluminum Oxide- The limit for aluminum oxide was presumably assigned.....”

*Division’s response: The Division has revised the permit as requested by the source with acception of removing the chlorine emission limit. The following language is added in the Compliance demonstration Method:*

*Chlorine emissions is assumed to be in compliance since NESHAP considers HCl as a surrogate for chlorine therefore, meeting NESHAP HCl limit ensures compliance with the chlorine limit.*

*The permittee shall maintain monthly flux used records and material safety data sheet detailing fluoride content for each flux used at each furnace. This information shall be made available to KDAQ upon request.*

- Section H, page 65 “The alternative operating scenarios by SCKP in our April 2008 draft permit should be retained.....”

*Division’s response: The Division does not agree with the comment. The Division discussed this issue and responses with representatives of SCKP during a meeting on November 13, 2008. The permittee agreed to request for permit modification to convert the group 2 furnaces to group 1 furnaces.*

## **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.